

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SARAH PALIN,	:	No. 17 Civ. 4853
	:	
Plaintiff,	:	
	:	
	:	Hon. Jed S. Rakoff
	:	
-against-	:	
	:	
	:	ECF Case
	:	
THE NEW YORK TIMES COMPANY,	:	
	:	
	:	
Defendant.	:	
	:	
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**SUPPLEMENTAL DECLARATION OF JAY WARD BROWN, ESQ.  
IN FURTHER SUPPORT OF DEFENDANT'S  
MOTION TO DISMISS THE COMPLAINT**

Under penalty of perjury, I, Jay Ward Brown, hereby declare as follows:

1. I am a partner in the firm Levine Sullivan Koch & Schulz, LLP, and am counsel of record for defendant in the above-captioned matter. I submit this supplemental declaration in further support of defendant's motion to dismiss the complaint to place before the Court certain documents of which it may take judicial notice. The facts stated below are true of my own personal knowledge and, if called to testify, I could and would testify competently thereto.

2. Attached hereto as Exhibit A are true and correct copies of Plaintiff's two Notices of Serving Subpoenas to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, and an example of one of the corresponding subpoenas, to Jesse Wegman, as served on defendant in this action. I have not included copies of all of the 23 subpoenas referenced in the Notices in order not to burden the Court with duplicative materials.

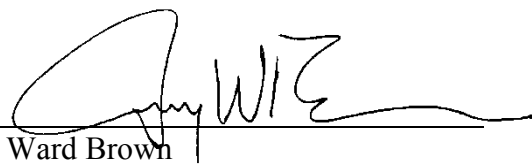
3. Attached hereto as Exhibit B is a true and correct copy of the article “On the Media: With the Tucson shooting, impatient pundits can’t wait till all the facts are in,” written by James Rainey and published in The Los Angeles Times on January 11, 2011. The article is also available at <http://articles.latimes.com/print/2011/jan/11/entertainment/la-et-onthedia-20110111> (last visited July 23, 2017).

4. Attached hereto as Exhibit C is a true and correct copy of the article “As portrait of Jared Loughner sharpens, ‘vitriol’ blame fades,” written by Patrik Jonsson and published in The Christian Science Monitor on January 12, 2011. The article is also available at <https://www.csmonitor.com/USA/Politics/2011/0112/As-portrait-of-Jared-Loughner-sharpens-vitriol-blame-fades> (last visited July 23, 2017).

5. Attached as Exhibit D is a true and correct copy of the article “At a D.C. pizzeria, the dangers of fake news just got all too real,” written by Petula Dvorak and published in The Washington Post on December 5, 2016. The article is also available at [https://www.washingtonpost.com/local/at-a-dc-pizzeria-the-dangers-of-fake-news-just-got-all-too-real/2016/12/05/b8ae43b8-baf4-11e6-94ac-3d324840106c\\_story.html?utm\\_term=.83cd315c5c17](https://www.washingtonpost.com/local/at-a-dc-pizzeria-the-dangers-of-fake-news-just-got-all-too-real/2016/12/05/b8ae43b8-baf4-11e6-94ac-3d324840106c_story.html?utm_term=.83cd315c5c17) (last visited July 23, 2017).

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct.

DATED: July 26, 2017

  
Jay Ward Brown